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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

NAKIA V. PORTER, et al.,

Plaintiffs,

v.

COUNTY OF SOLANO, et al.,

Defendants.

Case No. 2:21-CV-01473-KJM-JDP

**STIPULATION AND ORDER TO MODIFY
THE BRIEFING SCHEDULE FOR
PLAINTIFFS' MOTION FOR LEAVE TO
FILE THIRD AMENDED COMPLAINT**

Hon. Kimberly J. Mueller
Chief United States District Judge

Plaintiffs Nakia Porter, on behalf of herself and her minor children, L.P. and A.P., Joe Berry
Powell, Jr., and Clifton Powell, on behalf of his minor child O.P., (collectively "Plaintiffs") by and
through their counsel of record, Yasin M. Almadani and Ahmed Ibrahim, Defendants County of Solano,
Solano County Sheriff's Office, Sheriff Thomas A. Ferrara, Dalton McCampbell, Lisa McDowell,
Connor Hamilton, and Chris Carter, by and through their counsel of record, Danielle K. Lewis, and
Defendant Roy Stockton, by and through his counsel of record, Gregory M. Fox, (collectively together

1 “Defendants”) hereby stipulate to modify the current briefing schedule for Plaintiffs’ Motion for Leave
2 to File Third Amended Complaint.

3 Plaintiffs’ Motion for Leave to File Third Amended Complaint was filed on April 26, 2024.
4 Pursuant to Eastern District Local Rule 230(c), Defendants’ Opposition is due on May 10, 2024.
5 Plaintiffs’ reply thereto would be due on May 20, 2024. (E.D. Local Rule 230(d)) Counsel for the parties
6 have met and conferred and agreed that a modification of the briefing schedule is necessary.

7 The parties hereby stipulate that:

8 Defendants’ Oppositions to Plaintiffs’ Motion for Leave to File Third Amended Complaint will
9 be filed no later than **May 24, 2024**;

10 Plaintiffs’ reply thereto will be filed no later than **June 7, 2024**.

11 This request is based on the following facts demonstrating good cause.

12 1. Counsel for Defendant Roy Stockton, Gregory Fox, is presently out of the country on a
13 pre-planned trip, which began on April 27, 2024. Mr. Fox does not return to the United States until May
14 17, 2024. Given the current opposition deadline of May 10, 2024, Mr. Fox is unavailable for the entirety
15 of the time provided to file an opposition on behalf of Defendant Roy Stockton. Defendant Roy Stockton
16 will be unable to have an opposition to Plaintiffs’ Motion filed on his behalf.

17 2. Defendants believe additional time for filing an Opposition is also warranted given the
18 extensive nature of the modifications sought in the proposed Third Amended Complaint and the
19 information offered in support of Plaintiffs’ Motion. Plaintiffs do not agree with this assertion and
20 maintain that Defendants were on notice that the proposed amendments would be made if discovery
21 supported them, which it did, despite Defendants attempting to obstruct discovery on issues informing
22 *Monell* liability. Plaintiffs are agreeing to this stipulation solely out of professional courtesy.

23 3. In return for their professional courtesy, Plaintiffs request an additional week to file their
24 reply to each opposition, because between May 24 and June 7, Plaintiff’s counsel, Mr. Almadani, has
25 personal commitments, including a potential medical procedure, and Plaintiff’s counsel Mr. Ibrahim must
26 prepare for an extended trip that will commence on June 7.

27 4. This Stipulation addresses only the briefing schedule on Plaintiffs’ Motion and thus, by
28

entering into this Stipulation, Plaintiffs do not concede that it would be proper for Defendant Roy Stockton to file an Opposition to Plaintiffs' Motion, or that he would have standing to do so.

5. The hearing on Plaintiffs' Motion is set for July 12, 2024 at 10:00 a.m. The proposed modification to the briefing schedule will not impact this hearing date.

6. This stipulation does not seek to modify any other case deadlines.

7. No trial date has been set.

8. This stipulation is being filed in good faith and not for purposes of delay.

9. The Parties submit that the foregoing demonstrates good cause to grant the request in this Stipulation.

IT IS SO STIPULATED

Dated: April 30, 2024

ALMADANI LAW

/s/ Yasin M. Almadani

Yasin M. Almadani, Esq.

AI LAW, PLC

/s/ Ahmed Ibrahim

Ahmed Ibrahim, Esq.

Attorneys for Plaintiffs

Dated: May 1, 2024

HAWKINS PARNELL & YOUNG

/s/ Danielle K. Lewis

Danielle K. Lewis, Esq.

Miles F. Maurino, Esq.

Attorneys for Defendants County of Solano, Solano County Sheriff's Office, Sheriff Thomas A. Ferrara, Dalton McCampbell, Lisa McDowell, Connor Hamilton, and Chris Carter

Dated: April 30, 2024

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

/s/ Gregory M. Fox

Gregory M. Fox, Esq.

Attorneys for Defendant Roy Stockton

FILER'S ATTESTATION

I hereby attest that I have been authorized by counsel to show their signature on this document
as /s/.

DATED: May 1, 2024

/s/ *Danielle K. Lewis*
DANIELLE K. LEWIS

ORDER

The foregoing stipulation of the parties is approved, and IT IS SO ORDERED.

Defendants' Opposition to Plaintiffs' Motion for Leave to File Third Amended Complaint shall be filed no later than May 24, 2024. Plaintiffs' Reply brief(s) in response to Defendants' Opposition shall be filed no later than June 7, 2024.

DATED: May 7, 2025.


CHIEF UNITED STATES DISTRICT JUDGE